

EXHIBIT E

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Inc.

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 All Nippon Airways Company, Ltd.,

14 Plaintiff,

15 vs.

16 United Air Lines, Inc.,

17 Defendant.
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Case No.07-03422 EDL

**RESPONSES TO ALL NIPPON AIRWAYS
COMPANY, LTD.'S SECOND SET OF
DOCUMENT REQUESTS TO UNITED
AIRLINES, INC.**

-DATE:
TIME:
CTRM:
JUDGE:

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21 COMES NOW, Defendant United Air Lines, Inc., by and through its attorneys, Jaffe
22 Raitt Heuer & Weiss, P.C., and responds to Plaintiff All Nippon Airways Company, Ltd.'s
23 Second Set of Documents Requests as follows:
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UAL's Responses to 2nd Set of Document Requests

DOCUMENT REQUESTS**REQUEST NO. 1:**

True and correct copies of all documents concerning the Ramp Tower G Ramp Controller position at SFO in effect on October 7, 2003 regarding (i) communications with aircraft; (ii) clearances and instructions for pushback and taxi; (iii) traffic advisories and safety alerts; (iv) maintaining separation of aircraft in the vicinity of Terminal G; (v) ensuring that no collisions occur between aircraft; (vi) organizing and expediting the flow of traffic; (vii) paying attention to all aircraft and not focusing on one area to the exclusion of another; (viii) clearing potential conflicts between aircraft prior to or during taxi; (ix) clearing potential conflicts between aircraft prior to or during pushback; and (x) conflict resolution.

RESPONSE:

Objection: Overly broad and unduly burdensome. Subject to, and without waiving, these objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations manual to Plaintiff.

REQUEST NO. 2:

True and correct copies of the training materials and records for Edward Loh, including, but not limited to, all documents regarding the training of Edward Loh for his position as Ramp Tower G Ramp Controller at SFO in effect on or before October 7, 2003.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior document requests, including, but not limited to, plaintiff's request for Edward Loh's personnel and training records in its First Set of Document Requests. Additionally, the phrase "in effect" is

1 objectionably confusing and vague. And, to the extent this document request seeks documents
2 contained in personnel files, it seeks private information protected under California law, which
3 cannot be produced without permission of the individual whose files are being requested. This
4 request is also objectionable to the extent that it seeks information protected by the "self-critical
5 analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th
6 Cir. 1992).

7 Subject to, and without waiving, these objections, United has produced the non-
8 personal/non-medical portions of Edward Loh's personnel file as confidential bates range
9 documents UAL 000372 - UAL 000480.
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11 **REQUEST NO. 3:**

12 True and correct copies of all documents reflecting the training of Edward Loh for his
13 position as Ramp Tower G Ramp Controller at SFO received on or before October 7, 2003 from
14 (i) UAL; (ii) the Federal Aviation Authority; and (iii) San Francisco Terminal Equipment Co.
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16 **RESPONSE:**

17 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior
18 document requests, including, but not limited to, plaintiff's request for Edward Loh's personnel
19 and training records in its First Set of Document Requests. Additionally, this document request
20 plainly seeks documentation from sources that are not within United's influence and/or control.
21 And, to the extent this document request seeks documents contained in personnel files, it seeks
22 private information protected under California law, which cannot be produced without
23 permission of the individual whose files are being requested. This request is also objectionable
24 to the extent that it seeks information protected by the "self-critical analysis" privilege. *See*
25 *Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).
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1 Subject to, and without waiving, these objections, United has produced the non-
2 personal/non-medical portions of Edward Loh's personnel file as confidential bates range
3 documents UAL 000372 - UAL 000480.

4 **REQUEST NO. 4:**

5 True and correct copies of the training materials and records for John Rediger, including,
6 but not limited to, all documents concerning (i) clearing potential conflicts with other aircraft
7 prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during
8 pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; and (vi) determination of Pilot
9 Flying.

10 **RESPONSE:**

11 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior
12 document requests, including, but not limited to, plaintiff's request for John Rediger's personnel
13 and training records in its First Set of Document Requests. And, to the extent this document
14 request seeks documents contained in personnel files, it seeks private information protected
15 under California law, which cannot be produced without permission of the individual whose files
16 are being requested. This request is also objectionable to the extent that it seeks information
17 protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises,*
18 *Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

19 Subject to, and without waiving, these objections, United has produced the non-
20 personal/non-medical portions of John Rediger's personnel file as confidential bates range
21 documents UAL 000119 - UAL 000215.
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REQUEST NO. 5:

True and correct copies of the training materials and records for Scott M. Russell, including, but not limited to, all documents concerning (i) clearing potential conflicts with other aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; and (vi) determination of Pilot Flying.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior document requests, including, but not limited to, plaintiff's request for Scott M. Russell's personnel and training records in its First Set of Document Requests. And, to the extent this document request seeks documents contained in personnel files, it seeks private information protected under California law, which cannot be produced without permission of the individual whose files are being requested. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii Cruises, Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has produced the non-personal/non-medical portions of Scott M. Russell's personnel file as confidential bates range documents UAL 000001 - UAL 000118.

REQUEST NO. 6:

True and correct copies of the training materials and records for Brad Powell, including, but not limited to, all documents concerning (i) clearing potential conflicts with other aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during

1 pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; and (vi) determination of Pilot
2 Flying.

3 **RESPONSE:**

4 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior
5 document requests, including, but not limited to, plaintiff's request for Brad Powell's personnel
6 and training records in its First Set of Document Requests. And, to the extent this document
7 request seeks documents contained in personnel files, it seeks private information protected
8 under California law, which cannot be produced without permission of the individual whose files
9 are being requested. This request is also objectionable to the extent that it seeks information
10 protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii Cruises,*
11 *Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

13 Subject to, and without waiving, these objections, United has produced the non-
14 personal/non-medical portions of Bradley Powell's personnel file as confidential bates range
15 documents UAL 000216 - UAL 000302.

16 **REQUEST NO. 7:**

17 True and correct copies of the training materials and records for Julio Hernandez,
18 including, but not limited to, all documents concerning (i) pushback procedures; (ii)
19 responsibility for safe dispatch and clearance; (iii) determination of number and position of wing
20 walkers during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping
21 pushback when there is a question about clearance; (vi) clearing potential conflicts with other
22 aircraft prior to or during pushback; (vii) conflict resolution; and (viii) wing growth.
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RESPONSE:

Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior document requests, including, but not limited to, plaintiff's request for Julio Hernandez's personnel and training records in its First Set of Document Requests. And, to the extent this document request seeks documents contained in personnel files, it seeks private information protected under California law, which cannot be produced without permission of the individual whose files are being requested. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has produced the non-personal/non-medical portions of Julio Hernandez's personnel file as confidential bates range documents UAL 000481 - UAL 000547.

REQUEST NO. 8:

True and correct copies of any and all documents reflecting UAL's policies, procedures, and operations in effect on October 7, 2003 concerning (i) clearing potential conflicts with other aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; (vi) determination of Pilot Flying; (vii) determination of number and position of wing walkers during pushback; and (viii) Ramp Tower G Ramp Controller procedures prior to, during, and after issuance of clearance to push, clearance to taxi, and clearance to Spot 10 instructions.

RESPONSE:

Objection: Overly broad and unduly burdensome. Subject to, and without waiving, these objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355

1 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303
 2 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations
 3 manual to Plaintiff.

4 **REQUEST NO. 9:**

5 True and correct copies of any and all documents reflecting UAL's policies, procedures,
 6 and operations currently in effect concerning (i) clearing potential conflicts with other aircraft
 7 prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during
 8 pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; (vi) determination of Pilot
 9 Flying; (vii) determination of number and position of wing walkers during pushback; and (viii)
 10 Ramp Tower G Ramp Controller procedures prior to, during, and after issuance of clearance to
 11 push, clearance to taxi, and clearance to Spot 10 instructions.

13 **RESPONSE:**

14 Objection: Overly broad and unduly burdensome. Subject to, and without waiving, these
 15 objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355
 16 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303
 17 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations
 18 manual to Plaintiff.

20 **REQUEST NO. 10:**

21 True and correct copies of any and all documents reflecting changes in UAL's policies,
 22 procedures, and operations after October 7, 2003 concerning (i) clearing potential conflicts with
 23 other aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or
 24 during pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; (vi) determination of
 25 Pilot Flying; (vii) determination of number and position of wing walkers during pushback; and
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(viii) Ramp Tower G Ramp Controller procedures prior to, during, and after issuance of clearance to push, clearance to taxi, and clearance to Spot 10 instructions.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii Cruises, Inc*, 971 F 2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 11:

A true and correct copy of the UAL operations manual in effect on October 7, 2003 and applicable to the UAL aircraft involved in the Accident.

RESPONSE:

Objection: Overly broad, unduly burdensome, and duplicative of prior document requests. Subject to, and without waiving, these objections, United will produce a copy of the flight operations manual to Plaintiff.

REQUEST NO. 12:

A true and correct copy of the current UAL operations manual applicable to its B777 aircraft.

RESPONSE:

Objection: Overly broad, unduly burdensome, and duplicative of prior document requests. Subject to, and without waiving, these objections, United will produce a copy of the flight operations manual to Plaintiff.

REQUEST NO. 13:

True and correct copies of any and all documents reflecting changes in the UAL operations manual applicable to ground operations of its B777 aircraft after October 7, 2003.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 14:

True and correct copies of any and all documents which UAL and/or its flight crew was required to have on board Flight UA809 at the time of the Accident.

RESPONSE:

Objection: Vague, overly broad and unduly burdensome. Subject to, and without waiving, these objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates

1 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual
2 and flight operations manual to Plaintiff.

3 **REQUEST NO. 15:**

4 True and correct copies of any and all documents regarding pushback and taxi operations
5 of UAL B777 aircraft into and out of SFO in effect at the time of the Accident.

6 **RESPONSE:**

7 Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document
8 requests. Additionally, this document request potentially seeks materials privileged under the
9 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the
10 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*
11 *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992). Subject to, and without
12 waiving, these objections, United has produced the Ramp Service Driving Rules as bates
13 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates
14 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual
15 and flight operations manual to Plaintiff.
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18 **REQUEST NO. 16:**

19 True and correct copies of any and all documents regarding pushback and taxi operations
20 of UAL B777 aircraft into and out of SFO in effect at the present time.

21 **RESPONSE:**

22 Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document
23 requests. Additionally, this document request potentially seeks materials privileged under the
24 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the
25 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*
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1 *American Hawaii Cruises, Inc* , 971 F.2d 423, 425-26 (9th Cir. 1992). Subject to, and without
 2 waiving, these objections, United has produced the Ramp Service Driving Rules as bates
 3 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates
 4 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual
 5 and flight operations manual to Plaintiff.

6 **REQUEST NO. 17:**

7 True and correct copies of any and all documents reflecting changes in pushback and taxi
 8 operations of UAL B777 aircraft after October 7, 2003.

9 **RESPONSE:**

10 Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document
 11 requests. Additionally, this document request potentially seeks materials privileged under the
 12 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the
 13 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*
 14 *American Hawaii Cruises, Inc.* , 971 F.2d 423, 425-26 (9th Cir. 1992).

15 Subject to, and without waiving, these objections, United has not located any documents
 16 responsive to this Request.

17 **REQUEST NO. 18:**

18 True and correct copies of all documents reflecting UAL's policies, procedures, and
 19 operations in effect on October 7, 2003 concerning (i) pushback procedures; (ii) responsibility
 20 for safe dispatch and clearance; (iii) determination of number and position of wing walkers
 21 during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping pushback
 22 when there is a question about clearance; (vi) clearing potential conflicts with other aircraft prior
 23 to or during pushback; (vii) conflict resolution; and (viii) wing growth.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992). Subject to, and without waiving, these objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations manual to Plaintiff.

REQUEST NO. 19:

True and correct copies of all documents reflecting UAL's policies, procedures, and operations currently in effect concerning (i) pushback procedures; (ii) responsibility for safe dispatch and clearance; (iii) determination of number and position of wing walkers during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping pushback when there is a question about clearance; (vi) clearing potential conflicts with other aircraft prior to or during pushback; (vii) conflict resolution; and (viii) wing growth.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

1 Subject to, and without waiving, these objections, United has produced the Ramp Service
2 Driving Rules as bates numbers UAL 000355 - UAL 000371, and the Maintenance Manual
3 Handling document as bates numbers UAL 000303 - UAL 000354. Also, United will produce a
4 copy of the flight manual and flight operations manual to Plaintiff.

5 **REQUEST NO. 20:**

6 True and correct copies of all documents reflecting changes in UAL's policies,
7 procedures, and operations after October 7, 2003 concerning (i) pushback procedures; (ii)
8 responsibility for safe dispatch and clearance; (iii) determination of number and position of wing
9 walkers during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping
10 pushback when there is a question about clearance; (vi) clearing potential conflicts with other
11 aircraft prior to or during pushback; (vii) conflict resolution; and (viii) wing growth

12 **RESPONSE:**

13 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior
14 document requests. Additionally, this document request potentially seeks materials privileged
15 under the attorney-client privilege and/or work-product doctrine. This request is also
16 objectionable to the extent that it seeks information protected by the "self-critical analysis"
17 privilege. See *Dowling v. American Hawaii Cruises, Inc*, 971 F.2d 424, 425-26 (9th Cir. 1992).
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19 Subject to, and without waiving, these objections, United has not located any documents
20 responsive to this Request.
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22 **REQUEST NO. 21:**

23 True and correct copies of all documents reflecting the results and/or records of all
24 checks and tests conducted on Julio Hernandez for fitness for duty at the time of the Accident.
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RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests, including, but not limited to, plaintiff's request for Julio Hernandez's personnel and training records in its First Set of Document Requests. And, to the extent this document request seeks documents contained in personnel files, it seeks private information protected under California law, which cannot be produced without permission of the individual whose files are being requested.

Subject to, and without waiving, these objections, United has produced the non-personal/non-medical portions of Julio Hernandez's personnel file as confidential bates range documents UAL 000481 - UAL 000547.

REQUEST NO. 22:

True and correct copies of all documents reflecting procedures and policies concerning the Ramp Tower G Ramp Controller position at SFO in effect on October 7, 2003.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 23:

True and correct copies of all documents reflecting procedures and policies concerning the Ramp Tower G Ramp Controller position at SFO currently in effect.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992)

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 24:

True and correct copies of all documents reflecting changes to procedures and policies concerning the Ramp Tower G Ramp Controller position at SFO from October 7, 2003 to present.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 25:

True and correct copies of all documents reflecting procedures and policies concerning the operation of Ramp Tower G at SFO in effect on October 7, 2003.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 26:

True and correct copies of all documents reflecting procedures and policies concerning the operation of Ramp Tower G at SFO in effect on October 7, 2003.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 27:

True and correct copies of all documents reflecting changes to procedures and policies concerning the operation of Ramp Tower G at SFO from October 7, 2003 to present.

RESPONSE:

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

REQUEST NO. 28:

True and correct copies of all Jeppesen charts applicable to ground operations of UAL B777 aircraft at SFO in effect on the date of the Accident.

RESPONSE:

Objection: Vague, overly broad, and unduly burdensome.

Subject to, and without waiving, these objections, United states that these documents are covered under Copyright protection as stated in the United Airlines Flight Manual.

REQUEST NO. 29:

True and correct copies of all Jeppesen charts applicable to ground operations of UAL B777 aircraft at SFO in effect at present.

RESPONSE:

Objection: Vague, overly broad, and unduly burdensome.

1 Subject to, and without waiving, these objections, United states that these documents are
2 covered under Copyright protection as stated in the United Airlines Flight Manual.

3 **REQUEST NO. 30:**

4 True and correct copies of all dispatch documents for Flight UA809 on October 7, 2003,
5 including but not limited to (i) flight plan; and (ii) assigned altitude.

6 **RESPONSE:**

7 Objection: Vague, overly broad, compound, and unduly burdensome.

8 Subject to, and without waiving, these objections, United has not located any documents
9 responsive to this Request.
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11 **REQUEST NO. 31:**

12 Attach true and correct copies of any and all documents reflecting the requested and/or
13 assigned routing for Flight UA809 on October 7, 2003.

14 **RESPONSE:**

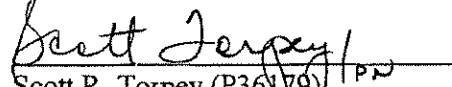
15 Objection: Vague, overly broad, compound, and unduly burdensome.

16 Subject to, and without waiving, these objections, United has not located any documents
17 responsive to this Request.
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Respectfully submitted,

JAFFE, RAITT, HEUER & WEISS, P.C.

By:


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And

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Attorneys for Defendant United Air Lines, Inc.

Dated: January 16, 2008

CERTIFICATE OF SERVICE

Phyllis L. Nelson certifies that she is an employee of Jaffe, Raitt, Heuer & Weiss, P.C. and that on January 16, 2008 she caused to be served Responses to All Nippoin Airways Company, Ltd's Second Set of Document Requests to United Airlines, Inc. on the person(s) listed below by placing said document(s) in a sealed envelope (if applicable), properly addressed, and forwarding same by the method(s) indicated.

By Email and First Class Mail

Marshall S. Turner
Condon & Forsyth LLP
7 Times Square
New York, NY 10036

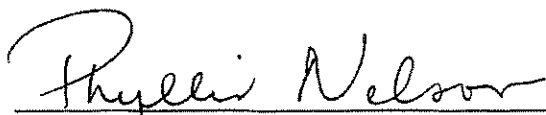
By Email and First Class Mail

Jeffrey A. Worthe
Worthe, Hanson & Worthe
1851 E. First St., Ste 900
Santa Ana, CA 92705

By Email and First Class Mail

Frank A. Silane
Roderick D. Margo
Scott D. Cunningham
Condon & Forsyth LLP
1901 Avenue of the Stars, Suite 850
Los Angeles, CA 90067-6010

Dated: January 16, 2008


Phyllis L. Nelson